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10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 WEBSITE MANAGEMENT SYSTEMS,
13 LLC, a Nevada Limited Liability
14 Company

Case No.: 2:20-cv-00213

15 Plaintiff,

16 v.

17 **DECLARATION OF THOMAS F. CIRO IN**
18 **SUPPORT OF MOTION FOR**
19 **PRELIMINARY INJUNCTION**

20 BENJAMIN DAILEDIA, an individual
21 residing in Nevada, MELVIN OMAN, an
22 individual residing in Nevada, DEVAN
23 HIRST, an individual residing in Nevada,
24 YES WE WILL, INC., a Nevada
25 Corporation, and DOES 1-X,

26 Defendants.

27 **DECLARATION**

28 I, Thomas F. Ciro, declare as follows:

1. I am the General Sales Manager for Website Management Systems, LLC ("WMS"). I was hired by WMS on March 29, 2012.

2. On January 24, 2020, I talked to Roosevelt Smith who had signed a contract with WMS to provide search optimization services. He identified 1st Page Group as the company that contacted him and attempted to persuade him to leave WMS using the using the same sales pitch, pitch materials, including website demo, and search engine optimization process as WMS.

3. On February 27, 2020, I talked to Mark McVey who had signed a contract with WMS to provide search optimization services. He identified 1st Page Group as the company that

DECLARATION OF THOMAS F. CIRO

1 contacted him and attempted to persuade him to leave WMS using the using the same sales pitch,
2 pitch materials, including website demo, and search engine optimization process as WMS. He
3 demanded a refund of \$6500 because he was unhappy after hearing and seeing the same sales
4 pitch, pitch materials, including website demo, and search engine optimization process as WMS
5 after being told by WMS that it's processes were unique.

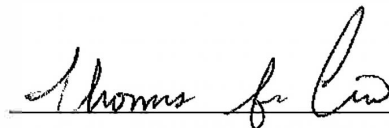
6 4. After learning that another company was formed by ex-employees of WMS to
7 compete with WMS using the same using the same sales pitch, pitch materials, including website
8 demo, and search engine optimization process as WMS, I participated in a call as a prospective
9 customer of 1st Page Group. I immediately realized from the voice that the person calling
10 himself James Webb at 1st Page Group was in fact Ben Daileida who I had worked with for 7+
11 years at WMS.

12 5. During the prospective customer call I also learned that 1st Page Group was using
13 the same sales pitch, pitch materials, including website demo, and search engine optimization
14 process as WMS. In some cases the materials were word-for-word the same as WMS.

15 6. I am personally aware that it has taken many years for WMS to develop its
16 process for sifting through directories and other information to be able to efficiently identify the
17 bad and the ugly leads versus the quality leads for its business. That is, it has taken years to
18 perfect and optimize the process.

19
20 I declare under penalty of perjury pursuant to the laws of the United States of America that
21 the foregoing is true and correct.
22

23
24 Dated: March 2, 2020



25 THOMAS F. CIRO
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